

# Exhibit A

## Summons and Complaint

PERSONAL INJURY

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF ANOKA

TENTH JUDICIAL DISTRICT

Carol Rabehl,

Court File No.

Plaintiff,

**SUMMONS**

vs.

Costco Wholesale Corporation a foreign  
Corporation, d/b/a Costco Wholesale  
Coon Rapids Warehouse,

Defendant.

THE STATE OF MINNESOTA TO THE ABOVE-NAMED DEFENDANT:

1. **YOU ARE BEING SUED.** The Plaintiff has started a lawsuit against you. The Plaintiff's Complaint against you is attached to this Summons. Do not throw these papers away. They are official papers that affect your rights. You must respond to this lawsuit even though it may not yet be filed with the Court and there may be no court file number on this Summons.

2. **YOU MUST REPLY WITHIN 20 DAYS TO PROTECT YOUR RIGHTS.** You must give or mail to the person who signed this Summons a written response called an Answer within 20 days of the date on which you received this Summons. You must send a copy of your Answer to the person who signed this Summons located at: 901 Marquette Avenue, Suite 500, Minneapolis, MN 55402-3205.

3. **YOU MUST RESPOND TO EACH CLAIM.** The Answer is your written response to the Plaintiff's Complaint. In your Answer you must state whether you agree or disagree with each paragraph of the Complaint. If you believe the Plaintiff should not be given everything asked for in the Complaint, you must say so in your Answer.

EXHIBIT

A

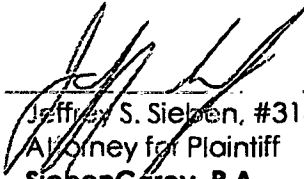
**4. YOU WILL LOSE YOUR CASE IF YOU DO NOT SEND A WRITTEN RESPONSE TO THE COMPLAINT TO THE PERSON WHO SIGNED THIS SUMMONS.** If you do not Answer within 20 days, you will lose this case. You will not get to tell your side of the story, and the Court may decide against you and award the Plaintiff everything asked for in the Complaint. If you do not want to contest the claims stated in the Complaint, you do not need to respond. A default judgment can then be entered against you for the relief requested in the Complaint.

**5. LEGAL ASSISTANCE.** You may wish to get legal help from a lawyer. If you do not have a lawyer, the Court Administrator may have information about places where you can get legal assistance. Even if you cannot get legal help, you must still provide a written Answer to protect your rights or you may lose the case.

**6. ALTERNATIVE DISPUTE RESOLUTION.** The parties may agree to or be ordered to participate in an alternative dispute resolution process under Rule 114 of the Minnesota General Rules of Practice. You must still send your written response to the Complaint even if you expect to use alternative means of resolving this dispute.

Dated: \_\_\_\_\_

5-6-20

  
Jeffrey S. Sieben, #314110  
Attorney for Plaintiff

**SiebenCarey, P.A.**

901 Marquette Avenue  
Suite 500

Minneapolis, MN 55402-3205  
(612) 333-4500

Jeffrey.Sieben@Knowyourrights.com

PERSONAL INJURY

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF ANOKA

TENTH JUDICIAL DISTRICT

Carol Rabehl,

Court File No.

Plaintiff,

vs.

**COMPLAINT**

Costco Wholesale Corporation, a foreign  
corporation, d/b/a Costco Wholesale  
Coon Rapids Warehouse,

Defendant.

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PLAINTIFF FOR HER CLAIM FOR RELIEF, STATES AND ALLEGES AS FOLLOWS:

1. That, on or about December 17, 2016, Plaintiff Carol Rabehl was injured while lawfully on the premises possessed by Costco Wholesale Coon Rapids Warehouse, located at 12547 Riverdale Boulevard, in the City of Coon Rapids, County of Anoka, State of Minnesota.
2. That, Defendant Costco Wholesale Corporation is a foreign corporation with its registered office located at 1010 Dale Street North, St. Paul, Minnesota 55117-5603.
3. That, on the aforementioned date, Plaintiff was caused to be injured while in Defendant's premises after slipping on a wet floor, falling to the ground, and striking her head.

4. That, Defendant, by and through its employees, knew, or in the exercise of reasonable care should have known, that the unsafe condition of the premises was likely to result in persons falling and suffering injury.

5. That, Defendant, by and through its employees, negligently and carelessly failed to maintain the premises in a reasonably safe condition and negligently failed to provide adequate warning of the unsafe condition of the premises to Plaintiff.

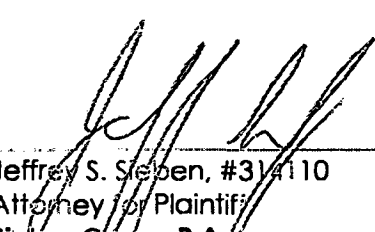
6. That, pursuant to the doctrine of respondeat superior, Costco Wholesale Corporation is vicariously liable for the wrongful acts of its employees.

7. That, as a direct and proximate result of the aforementioned negligence and carelessness of Defendant's employees, Plaintiff Carol Rabehl incurred significant medical expenses and sustained severe and permanent injuries.

**WHEREFORE**, Plaintiff Carol Rabehl demands judgment against Defendant Costco Wholesale Corporation herein for a reasonable sum in excess of Fifty Thousand (\$50,000.00) Dollars, together with interest, costs and disbursements herein.

Dated: \_\_\_\_\_

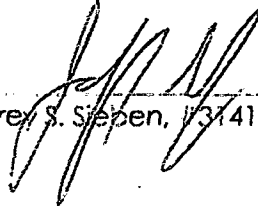
*May 6<sup>th</sup>, 2020*

  
\_\_\_\_\_  
Jeffrey S. Sieben, #314110  
Attorney for Plaintiff  
**SiebenCarey, P.A.**  
901 Marquette Avenue  
Suite 500  
Minneapolis, MN 55402-3205  
(612) 333-4500  
Jeffrey.Sieben@Knowyourrights.com

ACKNOWLEDGMENT

The undersigned hereby acknowledges that costs, disbursements, and reasonable attorney and witness fees may be awarded pursuant to Minn. Stat. §549.211 to the party against whom the allegations in this pleading are asserted.

Dated: May 6<sup>th</sup>, 2020

  
\_\_\_\_\_  
Jeffrey S. Sieben, 1314110


**Service of Process  
Transmittal**

05/14/2020

CT Log Number 537663068

**TO:** Laura Aznavoorian, Litigation Supervisor  
Gallagher Bassett Services, Inc.  
1901 S. Meyers Rd, Suite 200C  
Oakbrook Terrace, IL 60181

**RE: Process Served in Minnesota**

**FOR:** Costco Wholesale Corporation (Domestic State: WA)

**ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:**

**TITLE OF ACTION:** Carol Rabehl, Pltf. vs. Costco Wholesale Corporation, etc, Dft.

**DOCUMENT(S) SERVED:** -

**COURT/AGENCY:** None Specified  
Case # None Specified

**NATURE OF ACTION:** Personal Injury - Slip/Trip and Fall

**ON WHOM PROCESS WAS SERVED:** CT Corporation System, Inc, Saint Paul, MN

**DATE AND HOUR OF SERVICE:** By Process Server on 05/14/2020 at 09:16

**JURISDICTION SERVED :** Minnesota

**APPEARANCE OR ANSWER DUE:** None Specified

**ATTORNEY(S) / SENDER(S):** None Specified

**ACTION ITEMS:** CT has retained the current log, Retain Date: 05/14/2020, Expected Purge Date: 05/29/2020

Image SOP

Email Notification, Laura Aznavoorian laura\_aznavoorian@gbtpa.com

Email Notification, Zois Johnston zjohnston@costco.com

Email Notification, Maureen Papier maureen\_papier@gbtpa.com

**SIGNED:** CT Corporation System, Inc

**ADDRESS:** 1999 Bryan Street  
Suite 900  
Dallas, TX 75201

**For Questions:** 866-665-5799  
SouthTeam2@wolterskluwer.com